



Control Number: 51415



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SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415



APPLICATION OF SOUTHWESTERN § BEFORE THE STATE
PUBLIC SERVICE COMPANY FOR § OFFICE
AUTHORITY TO CHANGE RATES § OF
ADMINISTRATIVE HEARINGS

**MOTION IN INTERVENTION OF
TEXAS COTTON GINNERS' ASSOCIATION**

COME NOW Texas Cotton Ginnners' Association (hereinafter, "TCGA") and files this, its Motion to Intervene in the above-captioned docket. In support of this Motion, TCGA would show the following:

I.

The name, address, telephone number and e-mail address of TCGA is as follows:

TEXAS COTTON GINNERS' ASSOCIATION
Tony D. Williams
J. Kelley Green
408 West 14th Street
Austin, Texas 78701
(512) 476-8388 (Office)
(512) 476-8215 (Fax)
tony@tcga.org
kelley@tcga.org

II.

The name, address, telephone number and e-mail address of TCGA's authorized representative is as follows:

BRADY & HAMILTON, LLP
Zachary S. Brady
1602 13th Street
Lubbock, Texas 79401
(806) 771-1850 (Office)
(806) 771-3750 (Fax)
zach@bhlawgroup.com

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TCGA requests that the Public Utility Commission of Texas (“the Commission”) and all parties to this proceeding serve copies of all correspondence, pleadings, briefs, and other documents upon TCGA’s authorized representative at the Lubbock address shown above.

III.

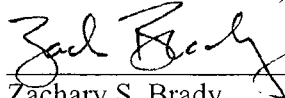
TCGA represents cotton gins around the state. The members of TCGA gin approximately 98 percent of all cotton ginned in Texas.

The TCGA member gins in the Applicant’s service area, listed in Exhibit A, will be affected by the Commission’s decision in this case. The outcome of this case will likely impact the rates paid by and terms of service provided to TCGA members. Therefore, TCGA has a substantial and vital interest in the outcome of this hearing and requests the opportunity to be heard.

TCGA will accept and abide by any existing procedural schedule in this matter.

NOW THEREFORE, for the above-mentioned reasons, TCGA respectfully requests that this, its Motion in Intervention in the above-captioned case be granted and request any other relief to which it may show itself entitled.

Respectfully submitted,
BRADY & HAMILTON, LLP



Zachary S. Brady

State Bar No. 24012320

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Stephen Adam Bender

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1602 13th Street

Lubbock, Texas 79401

Telephone: (806) 771-1850

Facsimile: (806) 771-3750

ATTORNEYS FOR INTERVENOR
TEXAS COTTON GINNERS’ ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties of record, via facsimile, or U.S. mail, electronic mail or e-service on this 5th day of November, 2020.

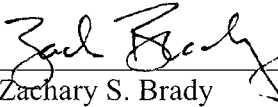

Zachary S. Brady

EXHIBIT A
TCGA MEMBER GINS

COUNTY	GIN NAME
COLLINGSWORTH	Tri-County Cooperative Enterprise, Inc. of Dodson, TX
HALL	Donley County Gin
HALL	Estelline Co-op Gin
HALL	Lakeview Farmers Co-op Gin
HALL	Memphis Farmers Gin Co., Inc.

From: noreply@puc.texas.gov
To: [Scottie Mataska](#)
Subject: PUC Filing Submission Confirmation: SKWKYJOR
Date: Thursday, November 5, 2020 3:22:09 PM

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2. AN ATTACHMENT OF THE GENERATED TRACKING NUMBER SHEET

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Filing
Submitted on 11/5/2020 3:21:59 PM
Control Number 51415 APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES
Filing Party Texas Cotton Ginners Association
Filing Type PLEADINGS
Description Texas Cotton Ginners Association's Motion to Intervene
Documents Motion to Intervene 11 5 2020.pdf
Addendum Included No
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